

December 7, 2018

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The Honorable Patrick J. Schiltz
United States District Court
14E U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415

Re: *Ligons, et al. v. Minnesota Department of Corrections, et al.*
Court File No. 15-CV-2210 (PJS/BRT)

Dear Judge Schiltz:

I write to bring a recent decision in a related case to the Court's attention:
Postawko, et. al. v. Missouri Department of Corrections, et. al, Eighth
Circuit 17-3029 (December 6, 2018).

Please let me know if you wish additional information or input.

Sincerely,

/s/ Andrew H. Mohring

Andrew H. Mohring

cc: Kathryn Fodness
Kelly S. Kemp
Peter J. Nickitas
Carl Peter Erlinder
Katie Crosby Lehman
Esther O. Agbaje